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March 13, 2023

BY: ECF

Hon. Jennifer E. Willis
United States Magistrate Judge
40 Foley Square, Room 228
United States Courthouse
New York, NY 10007

**Re: El Nabi v. City of New York
21-cv-03768 (LAK) (JW)**

Dear Hon. Willis,

We represent Plaintiff Hassab El Nabi in the above referenced matter. Per the court's order, Dkt. No. 51, we write jointly with previous plaintiff's counsel to provide the court with a status update. Counsel have not been successful in resolving this issue of previous counsel's charging lien and propose the following briefing schedule:

Previous counsel to file a motion by April 17, 2023

Current counsel to file opposition by May 19, 2023

Previous Counsel to file a reply by June 02, 2023.

As always, we thank the court for its time and attention to this matter.

Respectfully Submitted,

/s/
Tahanie A. Aboushi, Esq.

/s/

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/s/

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